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May 24, 2007

The Honorable Gregory M. Sleet
U.S. District Court
District of Delaware
844 N. King St.
Lockbox 19
Wilmington, DE 19801

Re *Villanueva v. TruGreen Limited Partners*, CA 1:06-cv-00185 (GMS)

Judge Sleet:

In anticipation of the discovery conference scheduled for May 25, 2007 at 11:15 a.m. in the above-captioned matter, the parties jointly submit the following items to be presented to the Court:

Plaintiff's Issues

1. Defendants' Failure To Respond Interrogatory 31 and Request for Production 10 (regarding "bonuses" or "advances" paid to H-2B workers upon arrival);
2. Defendants' Failure To Respond to Admissions 1, 2, 3, 6, and 7 and Interrogatories 7 and 9 (regarding expenses incurred by H-2B workers);
3. Defendants' Failure to Respond to Admissions 30 and 31 (regarding disclosures made to H-2A workers by Defendants' agents)
4. Defendants' Failure to Respond to Interrogatory 21 (regarding the factual contentions supporting Defendants' Third Affirmative Defense—Good Faith)

Defendants do not have any existing discovery issues beyond those raised by Plaintiff.

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The discovery request at issue and Defendants' responses thereto can be found at Docket Entry Number 52.

Respectfully submitted,

/s/ Edward Tuddenham
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